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Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Ross University School of Medicine v. Brooklyn-Queens Health Care Inc.
and Wyckoff Heights Medical Center, No. 09 Civ. 1410 (KAM) (RLM)

Dear Judge Mann:

I write on behalf of the Defendants in the above-captioned case to request the Court's permission to schedule the deposition of one third-party witness after the March 15 fact discovery cut-off. All counsel are working diligently to complete depositions and address other scheduling issues by March 15. However, because of a commitment of mine in another case, and the fact that this deposition will require out-of-town travel, it is not possible for me to participate in this deposition this week. Counsel for Ross and counsel for the witness have agreed, subject to the Court's permission, to schedule this one deposition shortly after March 15.

Respectfully submitted,


Walter P. Loughlin

cc: George J. Tzanetopolous, Esq.

*Application granted,
on consent.*

SO ORDERED:
/s/
Roanne L. Mann
U.S. Magistrate Judge
Dated: 3/9/11